

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

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TAYAH LACKIE,

Court File No.: 0:24-cv-01684 LMP/LIB

Plaintiff,

vs.

MINNESOTA STATE UNIVERSITY  
STUDENT ASSOCIATION, INC. d/b/a  
STUDENTS UNITED; ST. CLOUD  
STATE UNIVERSITY; GEORGE  
SOULE, in his official capacity as Chair  
of the Minnesota State Colleges and  
Universities Board of Trustees; DAWN  
ERLANDSON, in her official capacity as  
Vice Chair of the Minnesota State  
Colleges and Universities Board of  
Trustees; JAY COWLES, JIM  
GRABOWSKA, TIM HUEBSCH,  
JERRY JANEZICH, JACQUELINE  
JOHNSON, JANA JOHNSON, ROGER  
MOE, JAVIER MORILLO,  
CHRISTOPHER RICHTER, KATHY  
SHERAN, and CHERYL TEFER, in  
their official capacities as Members of  
the Minnesota State Colleges and  
Universities Board of Trustees; SCOTT  
OLSON, in his official capacity as  
Chancellor of the Minnesota State  
Colleges and Universities; ROBBYN R.  
WACKER, in her personal and official  
capacity as President of ST. CLOUD  
STATE UNIVERSITY, or her successor;  
and LARRY LEE, in his personal and  
official capacity as Vice President for  
Finance and Administration at ST.  
CLOUD STATE UNIVERSITY, or his  
successor,

Defendants.

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**MINNESOTA STATE**  
**UNIVERSITY STUDENT**  
**ASSOCIATION, INC. D/B/A**  
**STUDENTS UNITED'S**  
**L.R. 7.1 WORD COUNT**  
**COMPLIANCE CERTIFICATE**

I, Tamara L. Novotny, certify that Defendant Minnesota State University Student Association, Inc. d/b/a Students United's Memorandum in Support of its Motion to Dismiss Amended Complaint complies with Local Rules 7.1(f) of the United States District Court for the District of Minnesota.

I further certify that, in preparation of this Memorandum, I used the processing program Word for Microsoft 365, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the above referenced Memorandum contains 5,936 words.

**COUSINEAU MALONE, P.A.**

Dated: March 27, 2025

By: /s/ Tamara L. Novotny  
**Tamara L. Novotny** #029617X  
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